

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**CORE WIRELESS LICENSING
S.A.R.L.,**

Plaintiff,

v.

APPLE INC.,

Defendant.

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**Civil Action No. 6:12-CV-100-
LED-JDL**

JURY TRIAL REQUESTED

APPLE INC.'S NOTICE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282, Defendant Apple Inc. ("Apple") hereby submits this notice that it may rely at trial on one or more of the following patents, publications, and other prior art to show anticipation, obviousness, and/or the "state of the art" of one or more claims of U.S. Patent Nos. 7,383,022; 7,599,664; 6,266,321; 7,804,850; and 6,978,143 (collectively, the "Patents-in-Suit"). Apple may also rely on the person(s) listed below as being prior inventors or having prior knowledge of or as having previously used or offered for sale the alleged inventions of the Patents in Suit.

In addition to the items and people listed below, Apple incorporates by reference as if cited herein all patents, publications, and other prior art cited in the expert reports submitted by Apple in this action.

Apple also incorporates by reference as if cited herein all prior art cited and/or contained in the prosecution records of the applications that issued as the Patents in Suit, and any related patent applications that were filed in the United States or elsewhere.

Apple further incorporates by reference all Invalidity Contentions it served in this action, its List of Trial Exhibits, and its Witness List.

I. PATENTS

A. The '022 and '664 Patents

No.	Country	Patent/ Publication No.	Date Issued/ Published	Patentee
1.	United States	5,634,206	May 27, 1997	Reed et al.
2.	United States	6,456,827	Sep. 24, 2002	Kubo et al.

B. The '850 Patent

No.	Country	Patent/ Publication No.	Date Issued/ Published	Patentee
1.	United States	2004/0028006	Feb. 12, 2004	Kayama et al.
2.	United States	2004/0160914	Aug. 19, 2004	Sarkar
3.	United States	6,058,289	May 2, 2000	Gardner et al.
4.	United States	6,480,476	Nov. 12, 2002	Willars

C. The '321 Patent

No.	Country	Patent/ Publication No.	Date Issued/ Published	Patentee
1.	United States	5,712,869	Jan. 27, 1998	Lee et al.
2.	United States	5,926,500	Jul. 20, 1999	Odenwalder
3.	United States	5,930,230	Jul. 27, 1999	Odenwalder et al.
4.	United States	5,103,459	Apr. 7, 1992	Gilhausen et al.

D. The '143 Patent

No.	Country	Patent/ Publication No.	Date Issued/ Published	Patentee
1.	United States	6,347,091	Feb. 12, 2002	Wallentin et al.
2.	United States	5,640,414	Jun. 17, 1997	Blakeney et al.

II. OTHER DOCUMENTS**A. The '022 and '664 Patents**

No.	Title	Date	Page/Bates Nos.
1.	GSM 4.60 v8.0.0	July 1999	Pp. 1, 2, 29, 36-37, 103, 144, 214-215 APLCW0000089777- APLCW0000090030
2.	3GPP TS 05.08 V8.0.0	July 1999	Pp. 1, 2, 42-49 APLCW0000111913- APLCW0000111985
3.	EGPRS Link Quality Control - Measurements and Filtering	Sept. 1999	Olivier Dep. Ex. 23
4.	Optional Filtering For EGPRS LQC Measurements - Mobile Equipment based Filtering, Tdoc SMG2EDGE 2E99-604	Dec. 1999	APLCW0000090489- APLCW0000090496
5.	Draft Meeting Report of 34th SMG2 meeting	Jan. 2000	Pp. 1, 2, 10, 12, 106-107, 114-115, 126 APLCW0000116511- APLCW0000116649
6.	Meeting minutes for the December 13-16, 1999 ETSI SMG2 EDGE meeting	Dec. 1999	Pp. 1, 11-12, 25-27 APLCW-A0000000001- APLCW-A0000000027
7.	Optional Filtering for EGPRS LQC Measurements - Mobile-based filtering, Tdoc SMG2 2-00-250	Jan. 2000	APLCW-A0000000028- APLCW-A0000000036
8.	Change Request 04.60 CR A760 regarding Optional Filtering for EGPRS LQC Measurements, Document 2-00-251	Jan. 2000	APLCW-A0000000037- APLCW-A0000000043
9.	Change Request 05.08 CR A240 regarding EGPRS Link Quality Control Measurements, Document 2-00-252	Jan. 2000	APLCW-A0000000044- APLCW-A0000000054
10.	R.W. Hamming, Digital Filters 3rd Ed. (1989), pp. 1-20, 36-70, 124-163, 230-252, 272-279	1989	Pp. 1-20, 36-70, 124-163, 230-252, 272-279 APLCW-A0000026054- APLCW-A0000026124
11.	Nokia invention report - "Mobile	Nov.	CORE_A-00002866-

No.	Title	Date	Page/Bates Nos.
	Equipment Based Filtering For Link Quality Measurements"	1999	CORE_A-00002871
12.	GSM 4.08 v8.0.0	July 1999	Pp. 1, 2, 6-8 CORE_A-00184768- CORE_A-00184784
13.	Change Request 05.08 CR A240r3 regarding EGPRS Link Quality Control Measurements, Document 2-00-502	Jan. 2000	CORE_A-00026092- CORE_A-00026102
14.	Change Request 04.60 CR A760r3 regarding Filtering for EGPRS LQC Measurements, Document 2-00-520	Jan. 2000	CORE_A-00185081- CORE_A-00185093

B. The '850 Patent

No.	Title	Date	Page/Bates Nos.
1.	Chen et al. "Traffic Management for Wireless ATM Networks"	1998	APLCW0000124204- APLCW0000124211
2.	Autonomous transmission with TDM approach, 3GPP TSG RAN WG1 #38 bis, Seoul, Korea September 20 - 24, 2004, R1-041087	Sep. 2004	APLCW0000323756- APLCW0000323760
3.	Lin and Tseng, "An Adaptive Sniff Scheduling Scheme for Power Saving in Bluetooth" IEEE Wireless Communications, December 2002, p. 92-103	Dec. 2002	Pp. 92-103 APLCW0000388605- APLCW0000388616
4.	S. Keshav, An Engineering Approach to Computer Networking - ATM Networks, the Internet, and the Telephone Network, pp. 68-69, 402-405	1997	Pp. 68-69, 402-405 APLCW-A0000021076- APLCW-A0000021081
5.	Kleinrock and Lam, "Packet Switching in a Multiaccess Broadcast Channel: Performance Evaluation" IEEE Transaction on Communications, Vol. Com-23, No. 4, April 1975, p. 410-423	April 1975	Pp. 410-423 APLCW0000095280- APLCW0000095293
6.	Dimitri Bertsekas & Robert Gallager, Data Networks (2d ed.), pp. 30-31, 274-275, 286-287, 511-512	January 1992	Pp. 30-31, 274-275, 286-287, 511-512 APLCW-A0000021070- APLCW-A0000021075
7.	Rexford et al., A Scalable Architecture for Fair Leaky-Bucket Shaping (IEEE, 1997)	1997	APLCW-A0000021082- APLCW-A0000021090
8.	Invention Disclosure re: '850 Patent	June 2005	CORE_A-00185147- CORE_A-00185152

C. The '321 Patent

No.	Title	Date	Page/Bates Nos.
1.	Garber & Purseley, "Performance of Offset Quadrature Spread-Spectrum Multiple-Access Communications," IEEE Transactions on Communication, Vol. Com-29 No. 3, March 1981, pp. 305- 314	March 1981	pp. 305-314 APLCW0000393717- APLCW0000393726
2.	TIA/EIA/IS-95-A, pp. 6-7 – 6- 42	1995	pp. 6-7 – 6-42 APLCW0000393727- APLCW0000394507
3.	Chen et al., Effects of Nonlinear Distortion on CDMA Communication Systems, 1996 IEEE MTT-S Digest, pp. 775- 778	1996	pp. 775-778 APLCW0000116777- APLCW0000116780
4.	Peterson et al., Introduction to Spread Spectrum Communications, (Prentice Hall, 1995), pp. 47-88	1995	Pp. 47-88 APLCW0000121811- APLCW0000121854

D. The '143 Patent

No.	Title	Date	Page/Bates Nos.
1.	Radio Interface Protocol Architecture for 3G Mobile System, Version 1.0.0, January 15, 1999	Jan. 1999	Pp. 1, 2, 5-16, 22-24, 27-29 APLCW0000066276- APLCW0000066305
2.	Radio Access Layer Control - Inter-layer Interaction, ETSI SMG2 UMTS L23 Expert Group, Bois d'Arcy, France, November 12-13, 1998, SMG2 UMTS-L23 427/98	Nov. 1998	APLCW0000116701- APLCW0000116707
3.	UE Measurement Procedures - RRC Elementary Procedures, ETSI SMG2 UMTS L23 Expert Group, Bois d'Arcy, France, November 12-13, 1998, SMG2 UMTS-L23 432/98	Nov. 1998	APLCW0000116712- APLCW0000116714
4.	RRC messages for traffic volume measurement control and reporting, TSG-RAN Working Group 2 (Radio layer 2 and Radio layer 3), Yokohama 13th to 16th April 1999, TSGR2#4(99)247	April 1999	APLCW0000394534- APLCW0000394538
5.	Traffic Volume Measurements, TSG-RAN Working Group 2 (Radio layer 2 and Radio layer 3), Berlin 25th to 28th May 1999, TSGR2#4(99)420	May 1999	APLCW0000394595- APLCW0000394597
6.	MAC Assisted Dynamic Radio Access Bearer Control, TSG-RAN Working Group 2 (Radio layer 2 and Radio layer 3), Sophia Antipolis, 5th to 9th July 1999, TSGR2#5(99)624	July 1999	APLCW0000394598- APLCW0000394604
7.	CR to 25.303 on Traffic Volume Monitoring Procedure, TSG-RAN Working Group 2 (Radio layer 2 and Radio layer 3), Sophia Antipolis, 16th to 20th August 1999, TSG R2 #6(99)624	August 1999	APLCW0000394605- APLCW0000394607
8.	Results of RRC email ad hoc discussion, TSG-RAN Working Group 2 (Radio layer 2 and Radio layer 3), Sophia Antipolis 5th to 9th July 1999, TSGR2#5(99)525	July 1999	Pp. 1-2 APLCW-A0000003885- APLCW-A0000003906

No.	Title	Date	Page/Bates Nos.
9.	Draft minutes of WG2 meeting #6 Sophia Antipolis 16- 20 August 1999, v. 0.3, TSGR2#7(99)a01	Aug. 1999	Pp. 1, 4 APLCW-A0000003969- APLCW-A0000004004
10.	Approved minutes of WG2 meeting #4, Berlin 25 - 28 May 1999, v. 1.0, TSGR2#5(99)511	May 1999	Pp. 1, 6, 36-37 APLCW-A0000012565- APLCW-A0000012601
11.	Change request to S2.31 - SECOND DRAFT VERSION, TSG-RAN Working Group 2 (Radio layer 2 and Radio layer 3), Yokohama, Japan 13th to 16th April 1999, TSGR2#3(99)XXX	April 1999	Pp. 1, 5, 24-26 APLCW-A0000026012- APLCW-A0000026053
12.	Reset of Event Reporting, 3GPP TSG-RAN2 Meeting #29, Kyeongju, Korea, 13-17 May, 2002, R2-021116	May 2002	APLCW-A0000026125- APLCW-A0000026133
13.	3GPP S2.03 v0.0.1 (1999-01)	Jan. 1999	Pp. 1, 5, 11-13, 16-18, 39- 43, 48-49, 68 APLCW0000066320- APLCW0000066387
14.	UE-UTRAN L3 RRC Signaling Protocol Vol. 9, Ver. 1.0.0 of January 18, 1999	Jan. 1999	APLCW-A0000007236- APLCW-A0000007282
15.	MAC Sublayer Specification for 3G System, Ver. 1.0 of January 11, 1999	Jan. 1999	APLCW0000066229- APLCW0000066270
16.	Updated Version of YY.31 (Description of RRC Protocol), ETSI SMG2/UMTS L23 group, 18- 22 January 1999, Helsinki, Finland, SMG2 UMTS-L23 065/99	Jan. 1999	Pp. 1-3, 10-14, 22-24, 32- 35 APLCW0000066173- APLCW0000066217
17.	Uplink Allocation and Deallocation, TSG-RAN Working Group 2, Stockholm 8-11 March 1999, TSGR2#2(99)112	March 1999	Pp. 1-7 APLCW0000394527- APLCW0000394533
18.	Draft minutes of the 3GPP TSG- RAN WG2 meeting #1, 20-22 January 1999, Helsinki, Finland, RAN WG2 05/99	Jan. 1999	APLCW0000392636- APLCW0000392649
19.	Approved change requests to TS 25.303, October 6-8, 1999	Oct. 1999	APLCW-A0000004131- APLCW-A0000004131
20.	Draft minutes of the 3GPP TSG-	March	Pp. 1, 26

No.	Title	Date	Page/Bates Nos.
	RAN WG2 meeting #2 8 – 11 March 1999, Stockholm, Sweden (R2-99198)	1999	APLCW-A0000020078- APLCW-A0000020104
21.	Approved Minutes of WG2 meeting #3, Yokohama 13.- 16.4.1999 (v. 0.4)	April 1999	Pp. 1-3, 12, 13, 32 APLCW-A0000020105- APLCW-A0000020136
22.	RRC System Information Parameters, TSG-RAN Working Group 2, Stockholm 8-11 March 1999, TSGR2#2(99)118	March 1999	VIALEN000030- VIALEN000039
23.	UMTS YY.01 UE-UTRAN Radio Interface Protocol Architecture, Stage 2, Dec. 18, 1998	Dec. 1998	Pp. 1, 2, 8-15, 19-21 APLCW0000066435- APLCW0000066456
24.	UMTS (YY.02) Layer 1, General Requirements, Dec. 1998	Dec. 1998	ALPCW0000066457, 59, 72 APLCW0000066457- APLCW0000066482
25.	Vialen Ex. 1 - Invention Report Annex	Not dated	CORE_A-00002876- CORE_A-00002878
26.	Vialen Ex. 2 - Invention Report	June 1998	CORE_A-0200099- CORE_A0200100

III. PERSONS TO BE IDENTIFIED UNDER 35 U.S.C. § 282

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Apple reserves the right to supplement or to modify the foregoing through and including the time of trial.

Dated: December 5, 2014

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record via electronic mail in accordance with Local Rule CV-5(a)(7)(C).

Dated: December 5, 2014

/s/ Joseph J. Mueller
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